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Filing date: **10/22/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91207433
Party	Defendant Vo, Thanh Thuy Dao
Correspondence Address	MATTHEW H. SWYERS THE TRADEMARK COMPANY 344 MAPLE AVE W STE 151 VIENNA, VA 22180-5612  info@thetrademarkcompany.com
Submission	Answer
Filer's Name	Matthew H. Swyers
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Date	10/22/2012
Attachments	ANSWER.pdf ( 3 pages )(20840 bytes )

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE**  
**The Trademark Trial and Appeal Board**

Serial No. 85/609,438

For the mark: BEYOND WHITE,

Beyond Dental & Health, Inc.,

Opposer,

vs.

Thanh Thuy Dao Vo,

Applicant.

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Opposition No. 91207433

**ANSWER AND GROUNDS OF DEFENSE**

COMES NOW the Applicant, Thanh Thuy Dao Vo (hereinafter “Applicant”), by and through counsel, The Trademark Company, PLLC, and files his Answer and Grounds of Defense to the Notice of Opposition and in response to Opposer’s allegations states as follows:

**ANSWER**

Applicant is without knowledge of the allegations set forth in the Introductory Paragraph of the Notice of Opposition and therefore denies the same.

1. Applicant is without knowledge of the allegations set forth in paragraph 1 of the Notice of Opposition and therefore denies the same.

2. Applicant is without knowledge of the allegations set forth in paragraph 2 of the Notice of Opposition and therefore denies the same.

3. Applicant is without knowledge of the allegations set forth in paragraph 3 of the Notice of Opposition and therefore denies the same.

4. Applicant denies the allegations set forth in paragraph 4 of the Notice of Opposition as phrased and demands strict proof thereof.

5. Applicant denies the allegations set forth in paragraph 5 of the Notice of Opposition and demands strict proof thereof.

6. Applicant denies the allegations set forth in paragraph 6 of the Notice of Opposition and demands strict proof thereof.

7. Applicant denies the allegations set forth in Paragraph 7 of the Notice of Opposition and demands strict proof thereof.

8. Applicant denies the allegations set forth in Paragraph 8 of the Notice of Opposition and demands strict proof thereof.

9. Applicant denies the allegations set forth in paragraph 9 of the Notice of Opposition and demands strict proof thereof.

10. Applicant denies the allegations set forth in paragraph 10 of the Notice of Opposition and demands strict proof thereof.

Applicant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed.

Respectfully submitted this 22<sup>nd</sup> day of October, 2012.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/

Matthew H. Swyers, Esq.

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Counsel for Applicant

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I caused a copy of the foregoing this 22<sup>nd</sup> day of October, 2012, to be served, via first class mail, postage prepaid, upon:

Dimitri P. Dovas, Esq  
Dovas Law, P.C.  
307 Bainbridge Street  
Philadelphia, PA 19147

/Matthew H. Swyers/  
Matthew H. Swyers